

**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF OHIO**  
**EASTERN DIVISION**

**IN RE NATIONAL PRESCRIPTION  
OPIATE LITIGATION**

This document relates to:

*All actions*

**MDL No. 2804**

**Case No. 17-md-2804**

**Judge Dan Aaron Polster**

**MOTION FOR PROPOSED AGREED ORDER DESIGNATING SPECIAL MASTER**  
**PURSUANT TO GLOBAL TRIBAL OPIOID SETTLEMENT AGREEMENTS**

The Tribal Leadership Committee (TLC), on behalf of Participating Tribes that have reached resolutions with certain Distributors (McKesson Corporation, AmerisourceBergen Corporation (n/k/a Cencora, Inc.), and Cardinal Health, Inc.), Janssen Pharmaceuticals, Inc., Teva Pharmaceuticals, Inc., Allergan Finance LLC, Walmart Inc., CVS Health Corporation and CVS Pharmacy, Inc., and Walgreens Co. (the “Settlement Agreements”), respectfully move this Court to enter the attached Order designating David R. Cohen as Special Master to oversee and administer the Settlement Agreements pursuant to their terms.

Each of the Settlement Agreements provides and agrees that David R. Cohen shall serve as “Special Master ... appointed by the MDL Court” to perform specified functions in overseeing and administering the Settlement Agreements. By their Agreements, the TLC and the Settling Defendants have all consented to David R. Cohen serving as Special Master, and have agreed to entry of the attached Order designating him as Special Master for administering those Agreements as set forth therein. This MDL Court previously appointed David Cohen as a Special Master for the litigation (docket no. 69, dated 1/11/18), and he has agreed to act as Special Master to fulfill the duties and obligations set forth in the Settlement Agreements.

The TLC, Settling Defendants and Special Master Cohen, having all consented and agreed to Special Master Cohen serving as Special Master to oversee and administer the Settlement Agreements, the TLC therefore respectfully requests the Court enter the attached Order so designating him.

Respectfully submitted,

/s/ Steven J. Skikos

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*For the Tribal Leadership Committee*